

Alwood, Jim

From: Alwood, Jim
Sent: Thursday, November 16, 2017 2:32 PM
To: Ruiz, Jazmin
Subject: RE: TSCA Nanomaterial Reporting - Clarification for Japanese Supplier

Dr. Ruiz - The answer to your question depends on how you characterize the makeup or form of the toner particles. We may need to have further discussion about that. If the answers in red do not clarify we may need to have a phone call or questions formally submitted with additional specific details. Please contact me if the answers in red do not provide clarification.

Jim

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From: Ruiz, Jazmin [mailto:Jazmin.Ruiz2@xerox.com]
Sent: Wednesday, November 15, 2017 9:14 PM
To: Alwood, Jim <Alwood.Jim@epa.gov>
Subject: TSCA Nanomaterial Reporting - Clarification for Japanese Supplier

Hello Mr. Alwood,

Our supplier needs further clarification regarding the answer to Question 15 in the guidance issued in August.

Our toner particles are >100 nm and are comprised of multiple substances. Some of these substances are of nano-size and are attached to the toner particle by van der waals or electrostatic force.

1. Do we need to report the nanomaterials attached to the toner particle even though the toner particle itself is >100 nm?

If the toner particles are imported as discrete particles that are greater than 100 nm they do not need to be reported – unless the smaller particles are identified as having separate functionality and meet the other criteria for a reportable chemical substance. This is the most straightforward situation and it may still not be very clear to all manufacturers and processors.

If the toner is imported as a mixture with discrete particles greater than 100 nm but also contains discrete particles less than 100 nm (maybe one or more of the multiple substances forming different particles in the toner formulation) those discrete particles less than 100 nm could be subject to reporting.

If the toner is manufactured in the US someone may have report any of the substances with particle sizes less than 100 nm used to make the toner with particle sizes greater than 100 nm.

Thank you for your help.

Jazmin

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